

Louisiana’s Adult Mental Health Services Transition Plan

Section 1: Settings Assessment

Action Item	Description	Proposed Start Date	Proposed End Date	STATUS
Review of Rules and Policies	OBH will assess all HCBS and related licensing rules/regulations and policies/procedures to determine degree of compliance with HCBS setting rule.	1/1/15	2/1/15	COMPLETED – Results are included in the “HCBS Settings Analysis” document at the following link www.dhh.louisiana.gov/index.cfm/page/1973 .
Participant Experience Survey	OBH will obtain feedback from participants through a survey to ensure participants’ experience is consistent with the HCBS setting requirements.	3/1/15**	4/30/15	
Provider Self-Assessment	OBH will develop an assessment tool that familiarizes providers with the new HCBS rule and allows an opportunity to measure compliance with the new requirements. The assessment tool will identify the areas of the new rule for which the provider is not compliant, thereby allowing providers to target compliance efforts.	3/1/15**	4/30/15	
Onsite Visits	Based on the results of the Participant Experience Survey and Provider Self-Assessment, OBH will conduct onsite visits to a sample of settings, including residential and	5/1/15	6/30/15	

	non-residential settings, to ensure they have HCBS characteristics.			
Analysis	OBH will compile and analyze the results of the settings analysis and present findings to stakeholders and CMS.	6/1/15	8/30/15	

Section 2: Remediation

Action Item	Description	Proposed Start Date	Proposed End Date	STATUS
Louisiana Administrative Code	OBH will revise rules as necessary to reflect federal regulations on HCBS settings.	1/1/15	2/1/15	Completed. No rule revisions were needed per Section 1 action item 1.
Service Definition Manual	OBH will revise the service definition manual (sdm), including policies and procedures, as necessary to incorporate regulatory requirements for HCBS and qualities of an HCBS setting.	1/1/15	2/1/15	Completed. No revisions to the sdm were needed per Section 1 action item 1.
Enrollment	The provider enrollment process will be revised to collect information on the proposed service setting to ensure it comports with the HCBS setting rule. Training will be provided to the Statewide Management Organization's enrollment staff to	2/1/15	3/31/15	

	heighten scrutiny of new providers/settings.			
Information Sharing	OBH will draft and distribute letters to providers describing the proposed transition, criteria for appropriate HCBS settings, deadlines for compliance, and technical assistance availability.	2/1/15	2/28/15	
Quality Framework Strategies	OBH or its designee will survey participants at least annually to monitor their experience with HCBS to ensure it aligns with federal requirements and expectations. In addition, OBH or its designee will monitor providers through the certification and review assessments to ensure continued compliance.	3/1/15	ongoing	
Provider Assessment Findings	OBH will require providers to submit a corrective action plan for areas that require remediation, if the setting is not presumed to be an institution. If settings are identified which are presumed to be institutions, OBH will conduct onsite visits to a sample of settings to determine if they have the HCBS characteristics. If OBH determines the settings have HCBS characteristics, OBH will	9/1/15	8/30/16	

	provide such evidence to CMS, who will make the final decision as to whether the setting is HCBS.			
Heightened Scrutiny Review	Locations presumed to be non-HCBS which are found to have the qualities of HCBS will be submitted to CMS for heightened scrutiny review.	9/1/15	9/30/15	
Participant Transition to Compliant Settings	OBH will develop a process for assisting participants to transition to a new setting as appropriate. Participants will be given timely notice and due process, and will have choice of alternative settings through a person-centered planning process. Transition of participants will be comprehensively tracked to ensure successful placement and continuity of services.	6/1/15	12/31/15	

Section 3: Public Comment

Action Item	Description	Proposed Start Date	Proposed End Date	STATUS
Announcement of Public Notice	OBH will include a white paper and transition plan on a designated website. Providers and stakeholders will be notified of the opportunity to provide public	10/15/14	2/15/15	COMPLETED – Providers and stakeholders were notified that information was included on our website on 1/26/15. The public notice appeared in all major

	comment by direct email. OBH will also publish a public notice in all the major newspapers in the State.			newspapers on 10/10/14.
Public Comment Period and Forum	OBH will host/participate in public forums to obtain feedback from stakeholders.	1/31/15	3/30/15	
Distribution of Informational Material	OBH will provide informational materials to 1915i members and their families about the HCBS setting rule.	1/30/15	3/15/15	
Integration of Public Comments into Transition Plan Revision	OBH will post each approved iteration of the transition plan to the designated website.	1/31/15	ongoing	
Ongoing Stakeholder Engagement	OBH will continue to share information and updates related to implementation of the transition plan and HCBS rule during future stakeholder meetings. Information related to progress and proposed actions will be shared to obtain feedback and comments/	11/11/14	ongoing	The next meeting is scheduled for January 30, 2015 from 1PM to 4PM at the Department of Health and Hospitals in room 118. The address is 628 N. Fourth Street, Baton Rouge.

**These activities are anticipated to begin on 3/1/15 to allow adequate time to develop the survey and assessment tools, and to provide necessary training to the Statewide Management Organization and providers prior to these activities taking place.

